

STEVEN BENITO RUSSO  
Chief of Enforcement  
JULIA BILAUER  
Commission Counsel  
FAIR POLITICAL PRACTICES COMMISSION  
428 J Street, Suite 620  
Sacramento, CA 95814  
Telephone: (916) 322-5660  
Attorneys for Complainant

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
STATE OF CALIFORNIA

In the Matter of	)	FPPC No.: 04/115
	)	
INTERNATIONAL BROTHERHOOD OF	)	
PAINTERS AND ALLIED TRADES	)	
POLITICAL ACTION TOGETHER	)	STIPULATION, DECISION, and
LEGISLATIVE AND EDUCATIONAL	)	ORDER
COMMITTEE—CONTRIBUTION	)	
ACCOUNT and JAMES WILLIAMS,	)	
	)	
Respondents.	)	

Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and Respondents, International Brotherhood of Painters and Allied Trades Political Action Together Legislative and Educational Committee—Contribution Account and James Williams, hereby agree that this stipulation will be submitted for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting.

The parties agree to enter into this stipulation to resolve all factual and legal issues raised by this matter and to reach a final disposition without the necessity of holding an administrative hearing to determine the liability of Respondents.

Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights set forth in sections 83115.5, 11503, and 11523 of the Government Code, and in section 18361 of title 2 of the California Code of Regulations. This includes, but is not limited to, the right to personally

1 appear at any administrative hearing held in this matter, to be represented by an attorney at  
2 Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to  
3 subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over  
4 the hearing as a hearing officer, and to have the matter judicially reviewed.

5 It is further stipulated and agreed that Respondents International Brotherhood of Painters and  
6 Allied Trades Political Action Together Legislative and Educational Committee—Contribution Account  
7 and James Williams violated the Political Reform Act by failing to disclose 11 late contributions in  
8 properly filed late contribution reports, in violation of Government Code section 84203, subdivision (a)  
9 (11 counts), as described in Exhibit 1. Exhibit 1 is attached hereto and incorporated by reference as  
10 though fully set forth herein. Exhibit 1 is a true and accurate summary of the facts in this matter.

11 Respondents agree to the issuance of the decision and order that is attached hereto. Respondents  
12 also agree to the Commission imposing upon them an administrative penalty in the amount of Seven  
13 Thousand Dollars (\$7,000). A cashier's check from Respondents, in said amount, made payable to the  
14 "General Fund of the State of California," is submitted with this stipulation as full payment of the  
15 administrative penalty and shall be held by the State of California until the Commission issues its  
16 decision and order regarding this matter. The parties agree that in the event the Commission refuses to  
17 accept this stipulation, it shall become null and void, and within fifteen (15) business days after the  
18 Commission meeting at which the stipulation is rejected, all payments tendered by Respondents in  
19 connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate and  
20 agree that in the event the Commission rejects the stipulation, and a full evidentiary hearing before the  
21 Commission becomes necessary, neither any member of the Commission, nor the Executive Director,  
22 shall be disqualified because of prior consideration of this stipulation.

23 Dated: \_\_\_\_\_

\_\_\_\_\_  
Mark Krausse, Executive Director  
Fair Political Practices Commission

26 Dated: \_\_\_\_\_

\_\_\_\_\_  
James Williams, individually and on behalf of International  
Brotherhood of Painters and Allied Trades Political Action  
Together Legislative and Educational Committee—  
Contribution Account, Respondents

1 **DECISION AND ORDER**

2 The foregoing stipulation of the parties, “In the Matter of International Brotherhood of Painters  
3 and Allied Trades Political Action Together Legislative and Educational Committee—Contribution  
4 Account and James Williams, FPPC No. 04/115,” including all attached exhibits, is hereby accepted as  
5 the final decision and order of the Fair Political Practices Commission, effective upon execution below  
6 by the Chairman.

7  
8 IT IS SO ORDERED.

9  
10 Dated: \_\_\_\_\_

\_\_\_\_\_  
11 Liane M. Randolph, Chairman  
12 Fair Political Practices Commission  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28